

May 7, 2006

Phillis Johnson-Bell
Surface Transportation Board
1925 K Street NW
Washington, DC 20423
Attention: Finance Docket No. 34797
Re: Victoria Rutson letter of April 7, 2006 soliciting comments on Docket 34797

Dear Phillis:

I am writing to express my concern over environmental issues associated with the proposed construction of a transloading facility in the Town of Wilmington Massachusetts. I reside to the north of the proposed site with my wife and three children. My concerns are as follows:

- **Air Pollution:** New England Transrail estimates 400 trucks per day, six days a week or 240,000 truck trips in and out each year. This will significantly affect the quality of the air we breathe. Diesel trucks produce tons of smog-forming nitrogen oxides (NOx) and toxic soot (particulate matter or PM) over their lifetime. It is the small size of the particulate matter that poses the greatest human health affect. Over 40 cancer causing substances are found in emissions from diesel-fueled engines. Diesel PM and NOx are also linked to increased asthma hospitalizations, pneumonia, heart disease, and chronic bronchitis. Furthermore, airborne particulates emanating from the sorting, grinding and bailing activities running continuously will contribute to long-term health risks. Our town is all too familiar with the effects of industrial pollution manifested by cancer clusters, and a rise in asthma and other health problems and loss of life especially in children, caused by carcinogenic compounds that originated at the same site under consideration for the NET project.
- **NET admits that they will unload construction and demolition waste onto a concrete floor to examine for hazardous substances at the north end of the transloading structure.** Because of the potentially large volume of waste (I estimate between 5 – 10 million pounds per day) and because of the pressure to move the material through the facility as fast as possible, I am concerned with NET's ability to identify hazardous waste (asbestos, heavy metal compounds and other materials that will become airborne or runoff into our ground water.
- **Water Pollution:** Olin has demonstrated that various waste products flow in the direction of five (05) of Wilmington's water supply wells which have been shut down due to contamination. As Victoria's letter states, the property proposed for development is listed by the Massachusetts Department of Environmental Protection as a TIA Disposal Site. Regulatory oversight has been transferred to the U.S. Environmental Protection Agency. It is my understanding that very little has been done to date to effectively clean up this site. The large plume is still a threat to our water supply. Developing the site before it is cleaned up is ludicrous. The NET development will impede efforts to effectively clean up the site. Moreover, I believe that excavating the site will increase the migration of contaminate and the associated runoff will exacerbate the pollution problem.
- **Noise Pollution:** Anyone familiar with large trucks knows how noisy they are. Backup alarms can be heard for over a mile away. Unloading a truck is a very noisy operation whether a dump truck or other type of truck, there will be one truck unloading every 2.4

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minutes assuming the facility operates 16 hours per day. Having worked with the U.S. Coast Guard inspecting various waterfront facilities performing similar operations, it is my experience that the sorting and grinding and bailing facilities will generate high levels of noise (requiring ear protection in the immediate area) which will carry through much of the town of Wilmington. Increased train traffic will also contribute to noise pollution.

- **Light Pollution:** It is obvious that to meet safety regulations, lighting at such a facility will emit an intense level of artificial light. Recent studies indicate that this is taking a large toll on bird populations during their bi-annual migrations. It is my opinion that it will have a negative effect on the residents of this town and its wildlife.
- **Water Use:** Due to the loss of the previously mentioned five (05) of our nine (09) wells Wilmington's water supply is already stressed beyond capacity. The entire town is under a water emergency with total lawn sprinkler bans in effect and we don't anticipate a change in the immediate future. I believe that the proposed NET facility will use significant amounts of water in the processing of waste products and significantly heighten our crisis.
- **Safety:** The infrastructure of this town is already burdened by the growth in recent years. NET's estimate 400 will stress our roads far beyond their capacity. I tried to visualize 400 trucks per day by considering the various intersections that would have to handle an additional 800 trucks (in and out) each day. A line of 400 trucks (*all heading for the NET facility*) traveling down Route 93 toward Wilmington would be 39 miles long factoring in the recommended safe following distance at highway speeds. There would be one truck arriving and another departing every 2.4 minutes assuming a 16 hour workday. Our roads are not capable of handling this additional traffic.
- **Train Traffic:** The referenced letter states that NET expects 400 trucks per day, but NET estimates that this will add only 15 carloads per day initially. This appears to be an erroneous statement. A dump trailer, for example, (48ft x 8.5ft x 8.8ft high) is rated to carry 3,240 cubic feet of cargo. An open-top aggregate hopper car carries approximately 2,600 cubic feet, and a coal car carries approximately 4,400 cubic feet. It appears that one good size truck will nearly fill a railcar. Therefore, an overly conservative estimate of the rail cars required to carry out 400 truck loads would certainly be greater than 200 rail cars... NOT 15 cars! Trains of this length, should they take the track that crosses Rte 38 would block the road for a long time.... A 200 car train with an average car length of 50 feet = 10,000 feet or 1.9 miles long traveling at 10 mph across Rte 38 would take about 12 minutes to pass.

In closing, I ask for your thoughtful reflection on the impact that this development will have to my family and neighbors. Please do not allow NET to develop this site.

Sincerely,



John J. Frackleton

22 Towpath Drive
Wilmington, MA 01887